

**BRIEFING**  
**REGIONAL ADMINISTRATOR, REGION 4**  
**EPA & NCEH/ATSDR CONCEPT PAPERS**  
**RADIOLOGICAL CONTAMINATION ASSOCIATED WITH**  
**FL PHOSPHATE MINING**  
**June 20, 2006**

\*\*\*\*\*DELIBERATIVE PROCESS\*\*\*\*\*FOIA EXEMPT\*\*\*\*\*DO NOT RELEASE\*\*\*\*\*

☐ **BACKGROUND**

- Waste Management Division was requested by the RA to identify and evaluate potential options to address the Florida phosphate TENORM issues that he could discuss with the FL Governor and EPA Administrator.
- Concept papers were developed in May 2006 by EPA and ATSDR to identify and evaluate potential criteria that could be used in the assessment and cleanup of sites.
- EPA also developed options that could be considered for moving forward with the Florida Phosphate Initiative.
- An initial meeting was held with ATSDR on May 8, 2006, to discuss the Concept Papers.
- ATSDR offered to develop exposure scenarios and identify criteria used at other radium cleanups.
- A follow-up meeting between EPA and ATSDR was planned.

☐ **ANTICIPATED ATSDR POSITION/COMMENTS**

- Acknowledges different roles and mandates for EPA and ATSDR (i.e., long-term risk vs. observable health effects).
- Would likely concur with EPA's use of 5pCi/g as a protective soil criterion.
- Identifies other possible criteria for assessment and cleanup:
  - ATSDR Minimum Risk Level (100 mRem/yr)
  - Florida Paradigm; >500 mRem/yr; 100 to 500 mRem/yr; and < 100 mRem/yr.
- ATSDR notes that as the regulatory agency, it's EPA's responsibility to set the cleanup number; ATSDR can review and comment on the criteria.
- ATSDR advised that its involvement at other sites has primarily been based on evaluating potential health using a maximum risk level of 100 mRem/yr MRL.

☐ **EPA STRATEGY OPTIONS**

- Seven options developed that provide general strategy for proceeding with FL Phosphate Initiative.
- Options based on CERCLA and State roles and include:
  - Option 1: CERCLA Response, No Prioritization
  - Option 2: CERCLA Response & Contaminant Level Prioritization
  - Option 3: CERCLA Response & Minimum Threshold Site Determination
  - Option 4: FDOH Paradigm
  - Option 5: State Deferral/Other Clean-up Authority
  - Option 6: State Re-Assessment/EPA Non-CERCLA Support
  - Option 7: No Action
- Options 1, 2, 3 involving an EPA response assumes areas were identified by an aerial radiological survey.
- Options only intended to address potential human health risks in current or future



residential exposure scenarios.

- Potential risks to human health in areas not yet developed expected to be managed through institutional controls.
- Recent consultations w/ ATSDR indicate that the Agency would likely concur with all options except Option 7: No Action.
- Consultations in 2005 indicate that the State of Florida may only concur with Option 4: FDOH Paradigm and Option 7: No Action.
- Recent consultations with OSRTI staff and ORIA staff indicate Option 2: CERCLA Response and Contaminant Level Prioritization would be a preferred option.



#### **NEXT STEPS**

- Follow-up discussion among EPA and ATSDR to confirm ATSDR's anticipated comments/position.
- Follow-up discussion among Region 4 RA, EPA Administrator and FL Governor regarding potential strategies.